

LOCAL BANKRUPTCY FORM 9013-3

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE MIDDLE DISTRICT OF PENNSYLVANIA**

IN RE:

Wesley Craig Halbert

CHAPTER 13

CASE NO. 1 - 17 -bk- 01568-HWV

Debtor(s)

ADVERSARY NO. - ap-
(if applicable)

Plaintiff(s)/Movant(s)

vs.

Nature of Proceeding:

Motion to Dismiss

Defendant(s)/Respondent(s)

Document #: 48

REQUEST TO CONTINUE HEARING/TRIAL WITH CONCURRENCE¹

This request must be filed at least twenty-four (24) hours prior to the hearing. All requests must be approved by the Court. Submitting a request is not an automatic continuance.

The undersigned hereby requests a continuance with the concurrence of the opposing party (parties). This is a first request for a continuance.²

Reason for the continuance.

Debtor needs to file Amended Schedule I and J as he has obtained employment and his relationship with his tenant/business partner has changed. The Chapter 13 Trustee needs to evaluate Plan feasibility in light of the Amended Schedules Debtor will file and in light of paystubs Debtor has submitted.

Contemporaneous with the filing of this request, the undersigned has served a copy of this request upon all counsel participating in this proceeding.

Dated: 1/16/2018

/s/Tony Sangiamo, Esquire

Attorney for Debtor

Name: Tony Sangiamo, Esquire

Phone Number: 717-718-1480

¹ No alterations or interlineations of this document are permitted.